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5 *Attorneys for Olympia Health Care LLC,*

Alecto Healthcare Services, LLC,

6 *Sherman/Grayson Hospital, LLC,*

7 *Alecto Healthcare Services Sherman, LLC,*

Laxman Reddy, Matthew Williams,

8 *and Jeremy Redin*

9 UNITED STATES DISTRICT COURT

10 CENTRAL DISTRICT OF CALIFORNIA

11
12 United States of America,

13 Plaintiff,

14 v.

15 Olympia Health Care LLC, Alecto
16 Healthcare Services, LLC, MPT of Los
Angeles, L.P., MPT of Olympia, LLC,
17 MPT Operating Partnership, L.P.,
Medical Properties Trust, Inc.,
18 Sherman/Grayson Hospital, LLC, Alecto
Healthcare Services Sherman, LLC,
19 Laxman Reddy, Matthew Williams, And
Jeremy Redin,

20
21 Defendants.
22

Case No. 2:23-cv-01783-ODW(PVC)

**NOTICE OF SUGGESTION OF
PENDENCY OF BANKRUPTCY
AND AUTOMATIC STAY OF
PROCEEDINGS**

Assigned to the Hon. Otis D. Wright II
and Magistrate Judge Pedro V. Castillo

23 Please be advised that on June 16, 2023, Alecto Healthcare Services LLC
24 (“Debtor”) commenced a bankruptcy case in the United States Bankruptcy Court for
25 the District of Delaware (the “Bankruptcy Court”) by filing a voluntary petition for
26 relief under chapter 11 of title 11 of the United States Code, §§ 101-1532, et. seq.
27 (the “Bankruptcy Code”). The Debtor’s Chapter 11 case is now pending before The
28

1 Honorable J. Kate Sickles, United States Bankruptcy Judge, in case number 23-
 2 10787-JKS (the “Chapter 11 Case). See Notice of Bankruptcy Case Filing, Exhibit
 3 1.

4 Please be further advised that under Section 362 of the Bankruptcy Code, as
 5 of the commencement of the Chapter 11 Case, the above-captioned action has been
 6 automatically stayed as against the Debtor. Section 362 of the Bankruptcy Code
 7 provides, in part, that the filing of a petition to commence a chapter 11 case operates
 8 as a stay of “the commencement or continuation, including the issuance or
 9 employment of process, of a judicial, administrative, or other action or proceeding
 10 against the debtor that was or could have been commenced before the
 11 commencement of the case under [chapter 11], or to recover a claim against the
 12 debtor that arose before the commencement of the case under [chapter 11]” and “any
 13 act to collect, assess, or recover a claim against the debtor that rose before the
 14 commencement of the [bankruptcy] case. . . .” 11 U.S.C. §§ 362(a)(1) & (6).

15 Please be further advised that additional information regarding the status of
 16 the Chapter 11 Case may be obtained by reviewing the docket of the Chapter 11
 17 Case, available electronically at <https://ecf.deb.uscourts.gov> (PACER login and
 18 password required) or by contacting the proposed bankruptcy counsel for the Debtor
 19 identified in Exhibit 1.

20 Dated: July 10, 2023

MICHAEL BEST & FRIEDRICH LLP

21
 22 By: /s/ Uttam Dhillon

23 Uttam Dhillon

24 Attorneys for Olympia Health Care LLC,
 25 Alecto Healthcare Services, LLC,
 26 Sherman/Grayson Hospital, LLC,
 27 Alecto Healthcare Services Sherman, LLC,
 28 Laxman Reddy, Matthew Williams,
 and Jeremy Redin

EXHIBIT

1

United States Bankruptcy Court
District of Delaware

Notice of Bankruptcy Case Filing

A bankruptcy case concerning the debtor(s) listed below was filed under Chapter 11 of the United States Bankruptcy Code, entered on 06/16/2023 at 2:43 PM and filed on 06/16/2023.

Alecto Healthcare Services LLC

101 N Brand Boulevard
Suite 1920
Glendale, CA 91203
Tax ID / EIN: 46-0829723



The case was filed by the debtor's attorney: The bankruptcy trustee is:

Scott J. Leonhardt

The Rosner Law Group LLC
824 Market Street
Suite 810
Wilmington, DE 19801
302-777-1111

Jami B Nimeroff

Brown McGarry Nimeroff LLC
919 N. Market Street
Suite 420
Wilmington, DE 19801
302-428-8142

The case was assigned case number 23-10787-JKS to Judge J Kate Stickles.

In most instances, the filing of the bankruptcy case automatically stays certain collection and other actions against the debtor and the debtor's property. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtor can request the court to extend or impose a stay. If you attempt to collect a debt or take other action in violation of the Bankruptcy Code, you may be penalized. Consult a lawyer to determine your rights in this case.

If you would like to view the bankruptcy petition and other documents filed by the debtor, they are available at our *Internet* home page www.deb.uscourts.gov or at the Clerk's Office, 824 Market Street, 3rd Floor, Wilmington, DE 19801.

You may be a creditor of the debtor. If so, you will receive an additional notice from the court setting forth important deadlines.

Una O'Boyle
Clerk, U.S. Bankruptcy Court

PACER Service Center

Transaction Receipt

06/23/2023 17:42:51			
PACER Login:		Client Code:	
Description:	Notice of Filing	Search Criteria:	23-10787-JKS
Billable Pages:	1	Cost:	0.10

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing **NOTICE OF SUGGESTION OF PENDENCY OF BANKRUPTCY AND AUTOMATIC STAY OF PROCEEDINGS** upon the following person(s) via Email as follows:

United States Department of Justice
Civil Division, Commercial Litigation
Ruth A. Harvey
Michael J. Quinn
John R. Kresse
T. Dietrich Hill
Branch 1100 L Street NW, 7th Floor
Box 875, Ben Franklin Station
Washington, DC 20044
John.Kresse@usdoj.gov
Direct 202-598-3811 / Fax 202-514-9163
Attorneys for Plaintiff United States of America

Dated: July 10, 2023

MICHAEL BEST & FRIEDRICH, LLP

/s/ Uttam Dhillon
Uttam Dhillon